

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

MEDLIANT INC.,

*Plaintiff,*

v.

KATRINA PONCE DE LEON,

*Defendant.*

Civil Action No.:

1:23-cv-00203-MAC

**NOTICE OF CORRECTION TO  
DEFENDANT’S MOTION TO  
DISMISS COMPLAINT [ECF NO. 8]  
AND REPLY TO MOTION TO  
DISMISS COMPLAINT [ECF NO.  
13]**

Honorable Marcia A. Crone

In Defendant’s Motion to Dismiss Complaint, ECF No. 8 at 9, and Reply to Defendant’s Motion to Dismiss Complaint, ECF No. 13 at 5 and n.3, Counsel for Defendant represented to the Court that Defendant lives in Florida. Counsel for Defendant has since learned that Defendant has moved back from Florida to Beaumont, Texas. Counsel apologizes for this inadvertent error and requests that the Court disregard the references to Defendant’s location. The remainder of the Motion and Reply remain unaffected.

DATED:       October 25, 2023  
              Denver, Colorado

/s/ Rachel Williams Dempsey  
Rachel Williams Dempsey

**TOWARDS JUSTICE**

Rachel Williams Dempsey (*pro hac vice*)  
Juno Turner (*pro hac vice*)  
David H. Seligman (*pro hac vice*)  
P.O. Box 371689, PMB 44465  
Denver, CO 80237-5680  
(720) 441-2236  
david@towardsjustice.org  
juno@towardsjustice.org  
rachel@towardsjustice.org

*Attorneys for Katrina Ponce de Leon*

**CERTIFICATE OF SERVICE**

I certify that on October 25, 2023, I electronically filed a true and correct copy of NOTICE OF CORRECTION TO DEFENDANT’S MOTION TO DISMISS COMPLAINT [ECF NO. 8] AND REPLY TO MOTION TO DISMISS COMPLAINT [ECF NO. 13], with the Clerk of Court for the U.S. District Court, Eastern District of Texas, through the Court’s Electronic Case Filing system, which will serve all counsel of record listed below:

R. Brandon Bundren  
Bradley Arant Boult Cummings LLP  
1600 Division Street, Suite 700  
Nashville, TN 37203  
bbundren@bradley.com

/s/ Rachel Williams Dempsey

Rachel Williams Dempsey